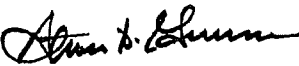


Exhibit A

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1 COMP
2 LAURENCE B. SPRINGBERG, ESQ.
3 Nevada Bar No. 003162
4 THOMAS & SPRINGBERG
5 844 East Sahara Avenue
6 Las Vegas, Nevada 89104-3017
7 (702) 731-9222/FAX 731-9181
8 Attorneys for Plaintiff


CLERK OF THE COURT

6 DISTRICT COURT
7 CLARK COUNTY, NEVADA

9 AKLILU ATANAW,

10 Plaintiff,

11 vs.

12 GENERAL MOTORS, LLC d/b/a GENERAL
13 MOTORS COMPANY, LLC; GARY LEE
14 HOSEY, JR. and Does I through V, inclusive,

15 Defendants.

A- 14- 706400- C
CASE NO.:
DEPT.: XXVI I

16 COMPLAINT

17 Plaintiff AKLILU ATANAW, by and through his attorneys, Thomas & Springberg, hereby
18 complains and alleges as follows:

19 FIRST CLAIM FOR RELIEF

20 I.

21 That the true names or capacities, whether individual, corporate, associate or otherwise, of the
22 Defendants, DOES I through V, inclusive, are unknown to the Plaintiff who therefore sues said
23 Defendants by such fictitious names. Plaintiff is informed and believes and therefore alleges that each
24 of the Defendants designated herein as DOE is legally responsible in some manner for the events and
25 happenings herein referred to, and legally and proximately caused injury and damages thereby to
26 Plaintiff as herein alleged.

27 II.

28 At all times relevant herein, Defendant GENERAL MOTORS, LLC. is and was a limited-

1 liability company organized and existing under the laws of the State of Delaware and is and was doing
2 business as GENERAL MOTORS, LLC and/or GENERAL MOTORS COMPANY, LLC in Clark
3 County, Nevada as the manufacturer, distributor and wholesaler of Chevrolet brand automobiles.

4 III.

5 At all times relevant herein, Defendant GARY LEE HOSEY, JR. is and was resident of Clark
6 County, Nevada.

7 IV.

8 On or about September 13, 2012, Plaintiff AKLILU ATANAW was a passenger in a 2001
9 Chevrolet Monte Carlo driven by Defendant GARY LEE HOSEY, JR. eastbound on Spring Mountain
10 Road in Clark County, Nevada. At said time and place, Defendant GARY LEE HOSEY, JR.
11 negligently failed to control said 2001 Chevrolet Monte Carlo and drove off the roadway striking a
12 number of objects including, but not limited to, a concrete retaining wall, a metal pole and a bus bench
13 structure, thereby causing Plaintiff AKLILU ATANAW to suffer the injuries and damages set forth
14 below.

15 V.

16 At the aforesaid time and place, and prior thereto, Defendant GARY LEE HOSEY, JR. willfully
17 consumed or used alcohol and/or other intoxicating substance, knowing that he would thereafter
18 operate a motor vehicle in violation of NRS 484.379. As a direct and proximate result of the foregoing,
19 Plaintiff has been caused to sustain the injuries and damages set forth below. Pursuant to NRS 42.010,
20 Plaintiff is entitled to recover punitive damages against said Defendant an amount in excess of Ten
21 Thousand Dollars (\$10,000.00).

22 SECOND CLAIM FOR RELIEF

23 I.

24 Plaintiff AKLILU ATANAW repeats, re-alleges and incorporates by reference herein each and
25 every allegation set forth in the First Claim for Relief, as if set forth in full herein.

26 II.

27 Defendant Defendant GENERAL MOTORS, LLC. is and was doing business as GENERAL
28 MOTORS, LLC and/or GENERAL MOTORS COMPANY, LLC, and is and was engaged in the

1 business of the design, manufacture, distribution and wholesaling of Chevrolet brand automobiles
2 including the above-described 2001 Monte Carlo.

3 III.

4 The above-described 2001 Monte Carlo was dangerous and defective in that the front
5 passenger side air bag failed to deploy at the time of the above-described accident.

6 IV.

7 As a direct and proximate result of the dangerous defect in the 2001 Monte Carlo, Plaintiff
8 AKLILU ATANAW did not receive the protection said air bag would have afforded. Prior to the car
9 accident of September 13, 2012 at issue, Defendant GENERAL MOTORS, LLC knew and/or should
10 have known of said dangerous defect in the 2001 Chevrolet Monte Carlo, but took no action to correct
11 the dangerous defect.

12 V.

13 As a direct and proximate result of all the foregoing, Plaintiff AKLILU ATANAW has been
14 caused to suffer serious bodily injury and great pain of mind and body, some or all of which may
15 continue into the future, all to his general damage in excess of Ten Thousand Dollars (\$10,000.00).

16 VI.

17 As a direct and proximate result of all the foregoing, Plaintiff AKLILU ATANAW has been
18 caused, and may in the future be caused, to incur medical bills and expend sums of money for medical
19 care and expenses incidental thereto in an amount to be determined at the time of trial.

20 VII.

21 As a direct and proximate result of all the foregoing, Plaintiff AKLILU ATANAW has been
22 caused to suffer a loss of income and/or earning capacity, in an amount to be determined at the time
23 of trial.

24 VIII.

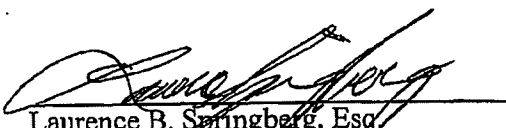
25 The acts and omissions of Defendant GENERAL MOTORS, LLC were reckless, outrageous,
26 oppressive, willful and/or malicious in that said Defendant's conduct was carried on with a conscious
27 disregard for Plaintiff's rights and safety, thereby warranting the assessment of exemplary and punitive
28 damages against said Defendant, in an amount in excess of Ten Thousand Dollars (\$10,000.00).

1 WHEREFORE, Plaintiff AKLILU ATANAW prays for judgment against Defendants, and
2 each of them, as follows:

- 3 1. General damages in excess of \$10,000.00;
- 4 2. Special damages according to proof;
- 5 3. Attorneys' fees and costs of suit;
- 6 4. Punitive damages in an amount in excess of \$10,000; and
- 7 5. For such other and further relief as this Court deems just and proper.

8
9 DATED this 2nd day of September, 2014.

10 THOMAS & SPRINGBERG

11
12 
13 Laurence B. Springberg, Esq.
14 Nevada Bar No. 003162
15 844 East Sahara Avenue
16 Las Vegas, Nevada 89104
17 Attorneys for Plaintiff
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